

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MICHAEL RODIO,

Plaintiff,

v.

R.J. REYNOLDS TOBACCO COMPANY,

Defendant.

2004 JUN 25 D 4:29

U.S. DISTRICT COURT
DISTRICT OF MASSCivil Action No. 04 CV 10006 ~~WES~~ JGD

LOCAL RULE 16.1 JOINT SCHEDULING CONFERENCE REPORT

I. Preliminary Statement

The parties certify that they have conferred prior to the scheduling conference for the purpose of: (1) preparing an agenda of matters to be discussed at the conference; (2) preparing a proposed pretrial schedule and discovery plan; and (3) considering whether they consent to trial by magistrate judge. Certifications required by Local Rule 16.1(D)(3) will be filed separately. Pursuant to Local Rule 16.1(D), the parties have conferred and jointly propose the following:

II. Agenda of Matters To Be Discussed At Scheduling Conference

The parties suggest that the following matters be discussed at the Scheduling Conference:

- A. Proposed pretrial schedule;
- B. Trial date; and
- C. Any other matters.

III. Proposed Pretrial Discovery and Motion Schedule

Plaintiff proposes the following:

Plaintiff and Defendant's Automatic Disclosure due – within 14 days after Local Rule 16.1(B) meeting

Plaintiff's Expert Disclosures served on	12/30/04
Defendant's Expert Disclosures served on	2/28/04
Fact Depositions and written discovery completed by	12/01/05
Expert Depositions completed by	12/01/05
All dispositive motions filed by: (responses due within thirty days of service)	12/15/05

Defendant proposes the following:

Plaintiff and Defendant's Automatic Disclosure due – within 14 days after Local Rule 16.1(B) meeting

Plaintiff's Expert Disclosures served on	7/30/04
Defendant's Expert Disclosures served on	9/15/04
Fact Depositions and written discovery completed by	11/01/04
Expert Depositions completed by	11/01/04
All dispositive motions filed by: (responses due within thirty days of service)	12/15/04

IV. Trial By Magistrate

Plaintiff and Defendant do not consent to trial by magistrate.

MICHAEL RODIO

By his attorney,

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R.J. REYNOLDS TOBACCO COMPANY

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Dated: January 26, 2004